

23 December 1997

Re: NEPA Technical Inquiry 0071 - Historic Doorknob Conversion

Dear NEPA Call-In User:

This letter is in response to your April 10, 1997 request for a summary of regulations covering accessibility issues in historic buildings, and sources for historic doorknob conversion for greater accessibility. Specifically, you would like to know what the requirements are for historic building accessibility for the physically disabled. You also heard there are companies who can provide equipment to modify historic doorknobs for greater accessibility. You would like to keep the historic doorknobs in place and modify them for greater accessibility rather than remove and replace them, and would like a list of vendors who provide this type of equipment.

SUMMARY OF FINDINGS

NEPA Call-In determined GSA is responsible for complying with Section 504 of the Rehabilitation Act of 1973, which states all Federally supported programs must be accessible to all people, including the disabled. This law does not require modification of historic doorknobs or other building features to convert to accessibility if alternative means can be found, such as hiring a permanent doorman to open doors when necessary. If GSA plans to convert structures for accessibility, guidelines in the Uniform Federal Accessibility Standards (UFAS) must be followed in order to comply with the Architectural Barriers Act of 1968. Lastly, NEPA Call-In identified several vendors who manufacture retrofit door levers that comply with the above regulations. NEPA Call-In's detailed finds are below.

DETAILED FINDINGS

NEPA Call-In found there are four legal documents which govern accessibility issues in historic buildings: the Americans with Disabilities Act, Architectural Barriers Act, UFAS, and the Rehabilitation Act.

1. Americans with Disabilities Act of 1990. The ADA (enclosed on 3.5" diskette in text format) states historic properties are not exempt from ADA requirements, and requires State and local governments as well as owners of "public accommodations" (theaters, restaurants, etc.) to make necessary changes to allow access to the physically disabled. The ADA further sets Accessibility Guidelines for owners of historic properties. However, the ADA only applies to non-Federal buildings.
2. Architectural Barriers Act of 1968. This Act (enclosed) states any new construction or alteration of buildings, including alterations to historic buildings, must comply with standards for accessibility. This Act does not require that a historic building be brought into compliance if alterations are not planned, and states alterations must comply with standards developed as required by the Act.
3. UFAS. This standard sets forth the accessibility guidelines, as

required by the Architectural Barriers Act, for Federal agencies such as General Services Administration and U.S. Postal Service, and were adapted from the ADA Accessibility Guidelines. UFAS Section 4.1.7 (enclosed) pertains to accessibility of historic buildings. In general, this section states a historic building must meet the accessibility provisions in Part 4 of the standard. However, an application must be made to the Advisory Council on Historic Preservation, (202) 606-8503, before any alteration to a qualified historic building takes place. The Advisory Council may determine that the historic building only needs to comply with the provisions listed in the UFAS section 4.1.7(2) "Historic Preservation: Minimum Requirements." The Advisory Council will reach this determination if the provisions required by Part 4 of the UFAS for accessible routes (exterior and interior), ramps, entrances, toilets, parking, and displays and signage, would threaten or destroy the historic significance of the building or facility. For example, the Council may determine that only one doorway into a building needs to be accessible. Section 504 of the Rehabilitation Act of 1973 does not require this doorway to be converted, but only that it is somehow accessible, whether it is staffed by a doorman or permanently propped open. If a decision is made by GSA to convert the doorknobs for accessibility, then UFAS Section 4.13.9, "Door Hardware" (enclosed), provides guidance for accessible door hardware standards.

4. Rehabilitation Act of 1973. Section 504 of the Rehabilitation Act (enclosed) states any Federally funded program or service must be accessible to all people, including the disabled. This does not necessarily mean alterations to a building must be made in order to comply with accessibility. Rather, it requires some alternative be found to provide access if building alterations are not possible or otherwise required. For instance, a doorknob does not necessarily have to be converted to standards for accessibility if some other way is found to make the door accessible. For example, there may be permanent staff, such as a door man, to open doors when it is required.

NEPA Call-In contacted the GSA National Program Manager for Accessibility, who verified the above requirements and their interpretation. The representative provided product information from Lindustries, in Massachusetts, (617) 237-8177 (enclosed). Lindustries manufactures the "Leveron Doorknob Adapter System," NSN 5340-01-400-0929, which meets handicapped codes. The representative also suggested we contact the Center for Universal Design for further product information.

We contacted Ms. Nancy Hitchcock, Information Specialist, Center for Universal Design, (919) 515-3082, who provided vendor information from SBI Industries, Sharon Hill, Pennsylvania; and Extend Incorporated, Moorhead, Minnesota (enclosed). Both companies can provide conversion equipment for existing doorknobs.

NEPA Call-In also contacted the U.S. Architectural and Transportation Barriers Compliance Board (ATBCB), Technical Assistance Desk, (202) 272-5434. The Technical Assistance Representative also verified the above mentioned requirements for historic preservation and accessibility compliance issues in Federal buildings. The representative recommended using the ATBCB UFAS Accessibility Checklist when planning building alterations (enclosed).

We contacted Ms. Ann Grimmer, Architectural Historian, Technical

Preservation Service, National Parks Service, (202) 343-9564, who provided "Preservation Briefs, Making Historic Properties Accessible," Thomas C. Jester and Sharon C. Park, September 1993. The brief explains the requirements for accessibility in historic buildings and provides guidance on making historic buildings accessible without damaging their historic character.

Lastly, NEPA Call-In performed an internet search for additional vendors of retrofit doorknob hardware which revealed the following vendor information (enclosed):

1. Van Duerr Handi-Levers, Van Duerr Industries, (800) 497-2003; and
2. "Leverall, Inc, Technical Newsletter," Volume 3, Fall 1995. This newsletter provides product information for retrofit levers from Leverall, Inc., Ansonia, Connecticut, (800) 559-9310.

The internet search also revealed the Center for Assistive Technology, University of Buffalo, but provided no product information. NEPA Call-In contacted Ms. Jennifer Weir, Information Coordinator, Center for Assistive Technology, University of Buffalo, (716) 829-3141, who provided product information, including prices, from the following companies:

1. Seton Name Plate Company, New Haven, Connecticut, (800) 243-6624;
2. Mark Corporation, Westford, Massachusetts, (617) 930-8570;
3. Extend Incorporated, Moorhead, Minnesota, (218) 236-9686;
4. Van Duerr Industries, Chico, California, (800) 497-2003;
5. Lindustries, Weston, Massachusetts, (617) 237-8177; and
6. Access Specialties and Products, Inc., A Division of Mobile Care, Inc., Bensenville, Illinois, (800) 8-LEVERS.

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Sincerely,

(Original Signed)

NEPA Call-In Researcher